

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IpLEARN, LLC,

Plaintiff,

v.

WBT SYSTEMS, LTD., *et al.*,

Defendants.

Civil Action No. 11-825-LPS

DEMAND FOR JURY TRIAL

**IpLEARN, LLC'S ANSWER TO DEFENDANT CONNECTIONS EDUCATION LLC'S**

**COUNTERCLAIMS**

Plaintiff IpLearn, LLC ("IpLearn"), by and through its undersigned attorneys, answers the Counterclaims of Defendant Connections Education LLC ("Connections") by corresponding paragraph number as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

**JURISDICTION AND VENUE**

5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

**COUNTERCLAIM COUNT I**

**(Declaratory Judgment of Non-infringement of the Asserted Patents)**

9. IpLearn incorporates the allegations in its First Amended Complaint for Patent Infringement and its response to paragraphs 1 through 8 of Connections' Counterclaims as if fully set forth herein.

10. Denied.
11. Denied.

**COUNTERCLAIM COUNT II**

**(Declaratory Judgment of Invalidity and/or Unenforceability of the Assert Patents)**

12. IpLearn incorporates the allegations in its First Amended Complaint for Patent Infringement and its response to paragraphs 1 through 11 of Connections' Counterclaims as if fully set forth herein.

13. Denied.

14. Denied.

**PRAYER FOR RELIEF**

WHEREFORE, IpLearn prays for the following relief with regard to Connections' Counterclaims:

- A. A dismissal with prejudice of Connections' Counterclaims;
- B. An adjudication that Connection is not entitled to any relief on its Counterclaim, including, without limitation, any fine or damages; and
- C. Costs and such further relief to which IpLearn is entitled, and which the Court deems just and equitable.

**DEMAND FOR JURY TRIAL**

IpLearn demands a trial by jury on all issues so triable.

December 22, 2011

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